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December 11, 1996

Federal Communications Commission Office of Socretary

DEC 1 1 1996

Mr. William F. Caton Acting Secretary **Federal Communications Commission** 1919 M Street, N.W., Room 222 Washington, DC 20554

Re:

MM Docket No. 87-268

Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service

Dear Mr. Caton:

Transmitted herewith on behalf of Iberia Communications, L.L.C. Communications"), are an original and five copies of its comments in response to the Sixth Further Notice of Proposed Rule Making, 11 FCC Rcd 10968 (1996), in the above-referenced proceeding.

The deadline for filing comments in this proceeding originally was November 22, 1996. However, by Order Extending Time for Filing Reply Comments, DA 96-1929 (released November 20, 1996), the Commission announced that it would accept comments that are filed "within a reasonable period of time after the November 22, 1996, due date." Id. at ¶5. Because the date for filing reply comments has been extended to January 10, 1997, there should not be any prejudice to interested parties as a result of this brief extension of time. Accordingly, Iberia Communications respectfully requests that its comments be considered in this proceeding.

Should any questions arise concerning this matter, please communicate directly with this office.

> Very truly yours, When Horting

Andrew S. Kersting

Counsel for Iberia Communications, L.L.C.

**Enclosures** 

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BEFORE THE

# Federal Communications Commission

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WASHINGTON, D.C. 20554

Federal Communications Commission Office of Socretary

In the Matter of	)	
	)	
Advanced Television Systems	)	
and Their Impact upon the	)	MM Docket No. 87-268
Existing Television Broadcast	)	
Service	j	

To: The Secretary

#### COMMENTS OF IBERIA COMMUNICATIONS, L.L.C.

Iberia Communications, L.L.C. ("Iberia Communications"), applicant for a new television station to operate on Channel 36 at New Iberia, Louisiana, submits these comments in response to the Sixth Further Notice of Proposed Rule Making, 11 FCC Rcd 10968 (1996) ("Sixth Further Notice"), in the above-captioned proceeding.<sup>1</sup>

#### I. Introduction

The Commission allotted NTSC Channel 36 to New Iberia, Louisiana, as its only local television service, prior to 1974. Iberia Communications filed its application for Channel 36 at New Iberia on June 12, 1996 (File No. BPCT-960612KF). A subsequent application was filed for the same channel on September 20, 1996, by New Iberia 36, L.L.C. (File No. BPCT-960920YI).

<sup>&</sup>lt;sup>1</sup> The deadline for filing comments in this proceeding originally was November 22, 1996. However, by Order Extending Time for Filing Reply Comments, DA 96-1929 (released November 20, 1996), the Commission announced that it would accept comments that are filed "within a reasonable period of time after the November 22, 1996, due date." *Id.* at ¶5. Because the date for filing reply comments has been extended to January 10, 1997, Iberia Communications does not believe that any prejudice to interested parties will result from this brief extension of time. Accordingly, Iberia Communications respectfully requests that its comments be considered in this proceeding.

Nevertheless, the allotment of Channel 36 at New Iberia has been omitted from the draft DTV Table of Allotments in this proceeding. *See Sixth Further Notice*, 11 FCC Rcd at 11035 (Appendix B). For the reasons stated herein, Iberia Communications respectfully requests that the Commission revise its draft DTV Table of Allotments to preserve the allotment of Channel 36 at New Iberia, or, alternatively, allot a substitute channel to that community.

#### 11.

# Retaining the Allotment of Channel 36 at New Iberia or Substituting an Alternative Suitable Channel to that Community Is Consistent With the Development of the DTV Table of Allotments and Will Serve the Public Interest

According to the 1990 U.S. Census, the city of New Iberia has a population of 31,706, which constitutes 46% of the population of Iberia Parish (68,297). New Iberia is projected to have a population of 36,134 by the year 2000, and is considered to be one of 54 communities which may become a Metropolitan Statistical Area by that time.<sup>2</sup>

Channel 36 was allotted to New Iberia prior to 1974, long before the Commission imposed its "freeze" on the filing of construction permit applications for new television stations.<sup>3</sup> Although a construction permit was issued to Tres Video Broadcasting, Ltd. (BPCT-830801KM), the permittee failed to construct the facility and the permit was ultimately rescinded on September 18, 1987, after the Commission's ATV freeze had commenced. Thus, although the residents of New Iberia and the surrounding area have been waiting more than a decade for the community's first local television

<sup>&</sup>lt;sup>2</sup> Haya El Nasser, Deeann Glamser, "50,000 Population Mark," USA Today, August 22, 1996, p. 2A.

<sup>&</sup>lt;sup>3</sup> Advanced Television Systems and Their Impact on the Existing Television Broadcast Service, RM-5811, 1987 FCC LEXIS 3477 (July 17, 1987), 52 Fed. Reg. 28346 (1987) ("Freeze Order").

service, that service has been blocked by a freeze which was triggered prior to the channel becoming available.

The draft DTV Table of Allotments set forth in the Sixth Further Notice does not preserve the existing NTSC Channel 36 allotment at New Iberia. Instead, the proposed Table assigns Channel 36 to the nearby community of Lake Charles, Louisiana, as the companion DTV channel for the existing Channel 7 allotment at Lake Charles. Sixth Further Notice, 11 FCC Rcd at 11035. The draft Table also assigns various channels to Stations WVLA(TV), Baton Rouge, KATC(TV), Lafayette, and KALB-TV, Alexandria, Louisiana, which further preclude the use of Channel 36 at New Iberia due to their UHF "taboo" relationships with the existing Channel 36 allotment. See Attached Engineering Statement of Mark B. Peabody ("Engineering Statement"), p. 2.

Although the Commission proposed to delete all vacant NTSC commercial allotments, in order to permit parties to file applications which were being prepared at the time the *Notice* was issued, the Commission announced that it would continue to accept applications for new NTSC stations that were filed no later than 30 days from the date the *Sixth Further Notice* was published in the Federal Register. *Sixth Further Notice*, 11 FCC Rcd at 10991-92, ¶¶58, 60. The Commission also stated that it would continue to process applications already on file and those that were filed "before the end of this filing opportunity" under its current policy of considering requests for waiver of its 1987 Freeze Order on a case-by-case basis.<sup>4</sup> *Id.* at 10992, ¶60. Thus, the *Sixth Further Notice* 

<sup>&</sup>lt;sup>4</sup> See Freeze Order.

made clear that the Commission has no intention of deleting allotments which are the subject of pending applications.<sup>5</sup>

As indicated above, there currently are two applications pending for the Channel 36 allotment at New Iberia. Both of these applications were filed before the cut-off date set forth in the *Sixth Further Notice*, and each requests a waiver of the Commission's Freeze Order. The relief sought herein regarding the Table of Allotments requires that the Commission also accept these applications. Acceptance of the applications will serve the compelling public interest objective of Section 307(b) of the Communications Act of providing a fair, efficient, and equitable distribution of television broadcast stations among the various states and communities.<sup>6</sup> Acceptance of the applications also will promote the second and third allotment priorities of providing each community with at least one television broadcast station and a choice of at least two television services to all parts of the U.S. *Sixth Report and Order*, 41 FCC at 167. Thus, in accordance with the *Sixth Further Notice*, both applications should be accepted for filing. *Sixth Further Notice*, 11 FCC Rcd at 10992, ¶60.

This proposal is consistent with the Commission's decision in Amendment of Section 73.606(b), Table of Allotments, TV Broadcast Stations (Willits, California), 10 FCC Rcd 7729 (Chief, Allocations Branch 1995), in which the Commission declined to delete the sole television channel allotted to a community, even though the applications pending for that facility were within an ATV freeze zone. The Commission found that retaining the channel was consistent with the second and third allotment priorities established in Amendment of Section 3.606 of the Commission's Rules and Regulations, 41 FCC 148, 167 (1952) ("Sixth Report and Order"), of providing each community with at least one television broadcast station and a choice of at least two television services to all parts of the U.S. 10 FCC Rcd 7731-32.

<sup>&</sup>lt;sup>6</sup> 47 U.S.C. §307(b). See National Broadcasting Co. v. U.S., 319 U.S. 190, 217 (1943) (goal of the Communications Act is to "secure the maximum benefits of radio to all the people of the United States"); FCC v. Allentown Broadcasting Corp., 349 U.S. 358, 359-62 (1955) (goal of Section 307(b) is to "secure local means of expression").

In the alternative, as demonstrated in the attached engineering statement, due to the relatively sparse population between New Orleans and Houston, there are a number of alternative channels that are suitable for allotment to New Iberia. *See* Engineering Statement, p. 3. Therefore, in the event the Commission should determine that it is not feasible to maintain the existing Channel 36 allotment at New Iberia, Iberia Communications requests that the Commission allot a substitute channel to permit the institution of a first local service at New Iberia and thereby promote the substantial public interest objectives of Section 307(b) of the Act.

#### III. Conclusion

As demonstrated herein, the draft DTV Table of Allotments should be revised to reflect the existing NTSC allotment of Channel 36 at New Iberia, and the Commission should assign suitable alternative DTV channels to the communities of Lake Charles, Baton Rouge, Lafayette, and Alexandria, Louisiana. Alternatively, the Commission should assign a suitable replacement channel to New Iberia and revise the existing Table of Allotments and draft DTV Table of Allotments accordingly.

Respectfully submitted,

IBERIA COMMUNICATIONS, L.L.C.

Howard M. Weiss

Andrew S. Kersting

Its Counsel

Fletcher, Heald & Hildreth, P.L.C. 1300 N. Seventeenth Street, 11th Floor Rosslyn, Virginia 22209 (703) 812-0400

December 11, 1996

#### **Engineering Statement**

#### Comments on the

# Sixth Notice of Proposed Rulemaking and the Draft DTV Table of Allotments

prepared for

#### Iberia Communications, L.L.C.

New Iberia, Louisiana - Ch. 36 - BPCT-960612KF

#### Introduction

Iberia Communications, L.L.C. ("Iberia Communications") has an application pending for a construction permit for a new UHF-TV station on Ch. 36 at New Iberia, Louisiana (BPCT-960612KF). Iberia Communications' application includes a request for a waiver of the July, 1987 HDTV freeze as the proposed transmitter site is 211.7 km from the reference point for New Orleans and 310.7 km from the reference point for Houston, Texas. Channel 36 was allotted to New Iberia, Louisiana prior to 1974. With the rescission of the CP issued to the first permittee, two applications have been filed to provide a first local service to New Iberia, Louisiana. Yet, the allotment of Channel 36 to New Iberia, Louisiana has been omitted from the proposed Draft Table of DTV allotments in the Sixth Further Notice of Proposed Rulemaking in MM Docket 87-268. The Commission's proposed Draft Table allots Channel 36 to nearby Lake Charles, Louisiana, thereby ignoring the unique status of the Ch. 36 allotment to New Iberia. Iberia Communications respectfully requests that the Commission consider the unique status of Ch. 36 at New Iberia and adjust its DTV Table of Allotments to continue to allot Ch. 36 or another suitable television channel to the community.

#### Use of Ch. 36 at New Iberia Predates the HDTV allotment freeze.

Use of the Ch. 36 allotment to New Iberia predates the development of the 1987 HDTV freeze. Channel 36 was allotted to New Iberia prior to 1974. A construction permit and call sign were issued to construct a facility (KYIS - BPCT-830801KM). For reasons that are not clear, the facility was never constructed and the construction permit was rescinded in September 1987. By the time the allotment was available for application by other interested parties, the HDTV freeze was in effect. In spite of the freeze, Iberia Communications has expressed an interest in serving New Iberia. An application has been tendered (BPCT-960612KF). Another application was filed subsequently by New Iberia 36, L.L.C. (BPCT-960920YI). However, the instant DTV rulemaking proceeding is proposing to delete the allotment. Iberia Communications is prosecuting its

# Engineering Statement (Continued - Page 2 of 4)

application for a new service at New Iberia with all possible diligence in order to operate a television station which the citizens of New Iberia have been awaiting for over a decade. The allotment and proposed use of Channel 36 at New Iberia predates the HDTV freeze and therefore warrants continued consideration in the proposed DTV Table of Allotments.

#### New Iberia Is a Community of at least 33,104 People

The 1990 U.S. Census reported 31,706 people in the city of New Iberia. This constitutes 46% of the population of the Iberia Parish (68,297). The 1995 projections by the U.S. Bureau of the Census report a population of 33,104 in the City of New Iberia. This would constitute 46.7% of the projected population of Iberia Parish (70,742). At present, neither Iberia Parish nor the city of New Iberia is part of any Metropolitan Statistical Area or urbanized area.

#### Proposed Draft DTV Table Uses "Vacant" New Iberia Allotment Nearby

The proposed Draft DTV Table assigns Channel 36 as the DTV companion to Channel 7 at Lake Charles (KPLC-TV). The Draft DTV Table also assigns channels with "taboo" relationships to Channel 36 which further preclude the use of Ch. 36 at New Iberia: Ch. 34, WVLA, Baton Rouge; Ch. 41, KATC, Lafayette; and Ch. 43, KALB-TV, Alexandria.

#### Alternative Allotments for Lake Charles

Iberia Communications respectfully requests the Commission to consider reincorporating the allotment of Ch. 36 at New Iberia by assigning some other DTV companion channels to Channel 7 at Lake Charles (KPLC-TV), WVLA, Baton Rouge; KATC, Lafayette; and KALB-TV, Alexandria. Among the channels that appear to be suitable to Lake Charles for KPLC-TV are Channels 46, 52, 53, 54, 56, 58, or 59. Attached as Tables Ia - Ig are summary data for channel studies illustrating compliance, or substantial compliance, with the existing and proposed minimum distance separation requirements for NTSC and DTV allotments for alternative channels for KPLC-TV at Lake Charles.

#### **Engineering Statement**

(Continued - Page 3 of 4)

#### Alternative Allotments for Ch. 36 at New Iberia

In the event that the Commission does not deem it practical to reincorporate Channel 36 at New Iberia in the proposed DTV Table, there are alternative channels to utilize at New Iberia. Included in this latter category are Channels 46, 57, 60, 61, 63, 64, 65, and 66. Attached as Tables IIa - IIh are summary data for channel studies illustrating compliance, or substantial compliance, with the existing and proposed minimum distance separation requirements for NTSC and DTV allotments for alternative channels for New Iberia.

#### Regional Allotment Groups

In the event that a regional coordination/allotment scheme is adopted along the lines of what is contemplated by the Broadcasters Caucus, the National Association of Broadcasters, and the Maximum Service Telecasters, Iberia Communications requests that the Commission reincorporate Channel 36 or another channel as proposed herein for New Iberia in order to allow the first local service to New Iberia to survive. Iberia Communications will work within such a local regional coordination scheme to find a suitable allotment for New Iberia.

#### Sparse Communities and Allotments Provide a Multitude of Alternatives

The attached tables illustrate that there are a variety of alternatives available to continue to provide a first local service to New Iberia. This is due mostly to the sparsely inhabited nature of the region between New Orleans and Houston. Iberia Communications acknowledges that the prospect of making a specific proposal to modify the Proposed DTV Table of Allotments to make room for New Iberia is akin to running tangentially in a straight line towards a moving target. Because of the unique nature of the Channel 36 allotment to New Iberia, and because this sparsely inhabited region can be served by a multitude of alternative channels, Iberia Communications believes that some accommodation can be reached for New Iberia. Other alternative channels might be identified by the Commission, should it decide not to delete the New Iberia allotment, but simply modify it. These would be welcome.

Engineering Statement

(Continued - Page 4 of 4)

Conclusion

The Commission's proposed Draft DTV Table allots Channel 36 to nearby Lake Charles,

Louisiana, thereby ignoring the unique status of the Ch. 36 allotment to New Iberia. Iberia

Communications respectfully requests that the Commission consider the unique status of the

allotment to New Iberia and either make room in the proposed DTV Table of Allotments for the

continued use of Ch. 36 at New Iberia or allow the existing applicants to use some other channel,

including those identified herein, to provide a first local service to New Iberia, Louisiana.

Certification

I, Mark B. Peabody, hereby certify that the foregoing statement was prepared by me or under

my direction, that it is true and correct to the best of my knowledge and belief, and that my

qualifications are a matter of record with the Federal Communications Commission.

Mark B. Peabody

December 9, 1996

#### Table Ia

## DTV Channel 46 - Lake Charles - KPLC Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

prepared for

# Iberia Communications, L.L.C.

Channel 46 Zone III - Latitude: Call Auth Licensee name City of License St FCC File No.	Chan Zone	ERP HAAT (kW) HAM	-m Latitude SL Longitude	BR-to -from	(km)	(km)	
KLAX-TV LIC POLLACK/BELZ COMMUN C ALEXANDRIA LA BLCT-890705KG							>96.6
ALLOC NACOGDOCHES TX	*32 o		31-36-06 9 <b>4-</b> 39-24				>96.6
KMCT-TV LIC CAROLINA CHRISTIAN BC WEST MONROE LA	39 + II	560 1	52 32-30-21 92-08-54				>96.6
NEW APP KB COMMUNICATIONS COR ALEXANDRIA LA BPCT-960920IX			64 31-14-11 88 92-27-34				>96.6
ALLOC ALEXANDRIA LA	41 + III		31-18-06 92-27-12	27.3 207.6	113.4 16.8	<24.1, CLOSE	>96.6
NEW APP DIMENSION BROADCASTIN ALEXANDRIA LA BPCT-940526KE			99 31-38-43 41 92-43-10				>96.6
WGMB LIC COMCORP OF BATON ROUG BATON ROUGE LA BLCT-910813KF	44 + III		26 30-19-35 27 91-16-36				>96.6
WGMB DTV-BATON ROUGE LA	<b>4</b> 5 III		26 30-19-35 91-16-36				>88.5
KZJL DTV-HOUSTON TX	-46 III		43 29-33-25 95-30-04				
WDSU DTV- NEW ORLEANS LA	46 III		83 29-57-01 89-57-28				
WBRZ DTV-BATON ROUGE LA	47 III		15 30-17-49 91-11-40				>88.5
WNTZ LIC DELTA MANAGEMENT CORP NATCHEZ MS BLCT-951010KS	48 o III		61 31-38-32 73 91-33-19				>96.6
KNWS-TV LIC JOHNSON BROADCASTING, KATY TX BLCT-931104KE			00 29-33-40 17 95-30-04				>96.6
NEW APP ESTES BROADCASTING LL LONGVIEW TX BPCT-96092011			82 32-15-35 16 94-57-02				>96.6
ALLOC SUBJECT TO FREEZE TYLER TX	60 o		32-21-04 95-18-03				>96.6
KZJL CP URBAN BROADCASTING SY HOUSTON TX BMPCT-950725KB			29 29-33-25 45 95-30-04				>96.6

#### Table Ib

# DTV Channel 52 - Lake Charles - KPLC Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

#### prepared for

# Iberia Communications, L.L.C.

Channel 52 Zone III - Latitude: Call Auth Licensee name City of License St FCC File No.	Chan ERP H	AAT-m Latitud HAMSL Longitud	de BR-to Dist. de -from (km)	Req.
ALLOC DELETION PROPOSED CIUDAD GUERRERO TA	37 o II			<24.1, >96.6
WGMB LIC COMCORP OF BATON ROUG BATON ROUGE LA BLCT-910813KF		426 30-19- 427 91-16-	35 92.2 166.0 36 273.1 69.0	) <24.1, >96.6 I CLEAR
WNTZ LIC DELTA MANAGEMENT CORP NATCHEZ MS BLCT-951010KS			32 44.5 195.4 19 225.2 98.4	1 <24.1, >96.6 3 CLEAR
KNWS-TV LIC JOHNSON BROADCASTING, KATY TX BLCT-931104KE			40 249.6 258.3 04 68.3 169.	
KNWS-TV DTV KATY TX	52 145		40 249.6 258.2 04 68.3 34.2	
KFXK DTV LONGVIEW TX	52 347 II		35 318.7 277. 02 137.7 53.	
KWTX-TV DTV WACO TX	53 1065 II		19 285.1 425. 58 102.9 336.	1 <32.2, >88.5 6 CLEAR
NEW APP ESTES BROADCASTING LL LONGVIEW TX BPCT-96092011			35 318.7 277. 02 137.7 181.	6 <24.1, >96.6 0 CLEAR
KHIM CP IMAGISTS CONROE TX BMPCT-951026K	55 + 5000 E III BT		50 265.4 204. 25 84.3 108.	8 <24.1, >96.6 2 CLEAR
KETK-TV APP REGION 56 TV NETWORK, TYLER TX BPCT-960710KH			16 310.8 259. 07 129.7 163.	7 <24.1, >96.6 1 CLEAR
KVVV LIC VVI BAYTOWN, INC. BAYTOWN TX BLCT-920207KE			56 241.1 247. 11 59.9 151.	7 <24.1, >96.6 1 CLEAR
ALLOC SUBJECT TO FREEZE TYLER TX	60 o II		04 315.5 307. 03 134.3 211.	9 <24.1, >96.6 3 CLEAR
LMRS DPLMRS CHANNEL SHARIN DALLAS TX	66 o II	32-47- 96-47-	09 307.5 446. 37 125.5 350.	8 <24.1, >96.6 2 CLEAR
KHSH-TV LIC SKHO BROADCASTING PARALVIN TX	67 o 5000 III DA		06 249.7 257. 57 68.5 161.	8 <24.1, >96.6 2 CLEAR

#### Table Ic

#### DTV Channel 53 - Lake Charles - KPLC Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

#### prepared for

# Iberia Communications, L.L.C.

Channel 53 Zone III - Latitude Call Auth Licensee name City of License St FCC File No	Chan c. Zone	ERP I	HAAT-m HAMSL	Latitude Longitude	BR-to -from			
KMCT-TV LIC CAROLINA CHRISTIAN WEST MONROE LA					18.8	247.6	<24.1,	>96.6
WNTZ LIC DELTA MANAGEMENT CONTROL MS BLCT-951010								>96.6
KNWS-TV LIC JOHNSON BROADCASTIN		2280 DABT		29-33-40 95-30-04				>96.6
KNWS-TV TX	DTV52	145	500	29-33-40 95-30-04				>88.5
KWTX-TV TX	DTV53 II	1065	552	31-19-19 97-18-58				
NEW APP ESTES BROADCASTING LONGVIEW TX BPCT-96092								>88.5
KHIM CP IMAGISTS CONROE TX BMPCT-9510		5000 BT						>96.6
KETK-TV APP REGION 56 TV NETWO		5000 BT						>96.6
KVVV LIC VVI BAYTOWN, INC. BAYTOWN TX. BLCT-92020		5000 DABT						>96.6
KDTX-TV LIC TRINITY BCG OF TEX. DALLAS TX		5000 DA		32-35-22 96-58-10				>96.6
ALLOC SUBJECT TO FREEZE TYLER TX	60 o II			32-21-04 95-18-03				>96.6
KZJL CP URBAN BROADCASTING HOUSTON TX BMPCT-9507		4680 DABT		29-33-25 95-30-04				>96.6
KHSH-TV LIC SKHO BROADCASTING ALVIN TX		5000 DA	563 563					>96.6
NEW CP METROPLEX COMMUNIC ARLINGTON TX BPCT-85042			492	32-35-07 96-58-06				>96.6

#### Table Id

# DTV Channel 54 - Lake Charles - KPLC Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

prepared for

Call Auth City of Lice	one III - Latitude: Licensee name nse St FCC File No.	Chan Zone	ERP (kW)	HAMSL	Latitude Longitude	BR-to	Dist. (km)	Req. (km)	
	CAROLINA CHRISTIAN BC					18.8	247.6	<24.1,	>96.6
KNWS-TV LIC KATY	JOHNSON BROADCASTING, TX BLCT-931104KE		2280 DABT	500 517	29-33-40 95-30-04				>96.6
KWTX-TV WACO	DTV TX	53 II	1065	552	31-19-19 97-18-58				>88.5
NEW APP LONGVIEW	ESTES BROADCASTING LL TX BPCT-96092011								
ALLOC LONGVIEW	ТX	54 II			32-29-30 94-44-00				
WUPL LIC SLIDELL	CORNERSTONE, INC. LA BLCT-950530KE								
NEW APP LONGVIEW	LONGVIEW TV BROADCAST TX BPCT-960920LK		5000 BT						
KHIM CP CONROE	IMAGISTS TX BMPCT-951026K		5000 BT						>88.5
KETK-TV APP TYLER	REGION 56 TV NETWORK, TX BPCT-960710KH								>96.6
KVVV LIC BAYTOWN	VVI BAYTOWN, INC. TX BLCT-920207KE								>96.6
KDTX-TV LIC DALLAS	TRINITY BCG OF TEXAS,		5000 DA	438	32-35-22 96-58-10	304.0 121.9	448.5 351.9	<24.1, CLEAR	>96.6
KZJL CP HOUSTON	URBAN BROADCASTING SY TX BMPCT-950725K		4680 DABT						>96.6
NEW APP HAMMOND	W B CORPORATION LA BPCT-960920LW		5000 BT					•	>96.6
NEW CP ARLINGTON	METROPLEX COMMUNICATI TX BPCT-850422KP		5000 DA		32-35-07 96-58-06				>96.6
LMRS HOUSTON	DPLMRS CHANNEL SHARIN	69 o			29-45-26 95-21-37				>96.6

#### Table Ie

# DTV Channel 56 - Lake Charles - KPLC Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

#### prepared for

Channel 56 Zone III - Latitude: Call Auth Licensee name City of License St FCC File No.	Chan Zone	ERP HAAT-	m Latitude L Longitude	BR-to Distfrom (km)	
NEW APP KB COMMUNICATIONS COR ALEXANDRIA LA BPCT-960920IX	41 +	5000 16	4 31-14-11	28.9 106.	7 <24.1, >96.6
ALLOC ALEXANDRIA LA				27.3 113.4 207.6 16.8	4 <24.1, >96.6 B CLOSE
NEW APP DIMENSION BROADCASTIN ALEXANDRIA LA BPCT-940526KE				10.9 141.2 191.0 44.	
NEW APP MS AUTHORITY FOR EDUC NATCHEZ MS BPET-960919KY				50.5 196. 231.3 99.	3 <24.1, >96.6 7 CLEAR
ALLOC NATCHEZ MS	*42 + III			49.4 201. 230.2 104.	1 <24.1, >96.6 5 CLEAR
WNTZ LIC DELTA MANAGEMENT CORP NATCHEZ MS BLCT-951010KS				44.5 195. 225.2 98.	4 <24.1, >96.6 8 CLEAR
KTFH APP PAXSON HOUSTON LICENS CONROE TX BPCT-960710KJ				265.4 204. 84.3 108.	8 <24.1, >96.6 2 CLEAR
KHIM CP IMAGISTS CONROE TX BMPCT-951026K				265.4 204. 84.3 116.	8 <9.7, >88.5 3 CLEAR
KETK-TV APP REGION 56 TV NETWORK, TYLER TX BPCT-960710KH				310.8 259. 129.7 15.	
KETK-TV APP MAX TV OF TYLER, L.P. JACKSONVILLE TX BPCT-960723KF				310.8 259. 129.7 15.	
KETK-TV LIC REGION 56 TV NETWORK, JACKSONVILLE TX BLCT-870319KE				310.7 287. 129.5 42.	
NEW APP KB COMMUNICATIONS COR WIGGINS MS BPCT-960920LV				75.1 331. 256.8 86.	
LMRS DPLMRS CHANNEL SHARIN HOUSTON TX	63 o	)	29-45-26 95-21-37	253.2 238. 72.0 141.	1 <24.1, >96.6 5 CLEAR

#### Table If

# DTV Channel 58 - Lake Charles - KPLC Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

#### prepared for

# Iberia Communications, L.L.C.

Channel 58 Zone III - Latitude: Call Auth Licensee name City of License St FCC File No.	Chan Zone	ERP (kW)	HAAT-m HAMSL	Latitude Longitude	BR-to	Dist. (km)	(km)	
WGMB LIC COMCORP OF BATON ROUG BATON ROUGE LA BLCT-910813KF	44 +	3871	426	30-19-35	92.2	166.0	<24.1, >9	6.6
KNWS-TV LIC JOHNSON BROADCASTING, KATY TX BLCT-931104KE								6.6
NEW APP ESTES BROADCASTING LL LONGVIEW TX BPCT-96092011				32-15-35 94-57-02				6.6
KHIM CP IMAGISTS CONROE TX BMPCT-951026KB		5000 BT					<24.1, >9 CLEAR	6.6
KETK-TV APP REGION 56 TV NETWORK, TYLER TX BPCT-960710KH				31-54-16 95-05-07				6.6
KVVV LIC VVI BAYTOWN, INC. BAYTOWN TX BLCT-920207KE				29-17-56 95-14-11				1.5
KDTX-TV LIC TRINITY BCG OF TEXAS, DALLAS TX	II	DA		32-35-22 96-58-10				
KTBC-TV DTV-				30-18-36 97-47-33				18.5
ALLOC SUBJECT TO FREEZE TYLER TX	60 o II			32-21-04 95-18-03			<24.1, >9 CLEAR	6.6
KZJL CP URBAN BROADCASTING SY HOUSTON TX BMPCT-950725K	61 o	4680	429					96.6
NEW APP W B CORPORATION HAMMOND LA BPCT-960920LW				30-25-56 91-11-06				96.6

#### Table Ig

## DTV Channel 59 - Lake Charles - KPLC Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

prepared for

Channel 59 Zone III - Latitude: Call Auth Licensee name City of License St FCC File No.	Chan ERP	HAAT-m Lat		Dist. Req.
======================================	Zone (xw)	namal Long	TCUGE TIOM	(KIII) (KIII)
WGMB LIC COMCORP OF BATON ROUG BATON ROUGE LA BLCT-910813KF	44 + 3871	426 30-	19-35 92.2	
KNWS-TV LIC JOHNSON BROADCASTING, KATY TX BLCT-931104KE				258.2 <24.1, >96.6 161.6 CLEAR
NEW APP ESTES BROADCASTING LL LONGVIEW TX BPCT-96092011				277.6 <24.1, >96.6 181.0 CLEAR
KHIM CP IMAGISTS CONROE TX BMPCT-951026K	55 + 5000 E III BT			204.8 <24.1, >96.6 108.2 CLEAR
KETK-TV APP REGION 56 TV NETWORK, TYLER TX BPCT-960710KH				259.7 <24.1, >96.6 163.1 CLEAR
KVVV LIC VVI BAYTOWN, INC. BAYTOWN TX BLCT-920207KE	57 + 5000 III DABT			247.7 <24.1, >96.6 151.1 CLEAR
KDTX-TV LIC TRINITY BCG OF TEXAS, DALLAS TX	58 o 5000 II DA			448.5 <9.7, >88.5 360.0 CLEAR
KTBC-TV DTV AUSTIN TX	59 1550 III			460.6 >223.7 236.9 CLEAR
ALLOC SUBJECT TO FREEZE TYLER TX	60 o II			307.9 <9.7, >88.5 219.4 CLEAR
KZJL CP URBAN BROADCASTING SY HOUSTON TX BMPCT-950725K				258.4 <24.1, >96.6 161.8 CLEAR
NEW APP W B CORPORATION HAMMOND LA BPCT-960920LW	62 + 5000 III BT			174.6 <24.1, >96.6 78.0 CLEAR
LMRS DPLMRS CHANNEL SHARIN HOUSTON TX	63 o III			2 238.1 <24.1, >96.6 141.5 CLEAR
ALLOC SUBJECT TO TV FREEZE TX	64 + II			344.7 <24.1, >96.6 3 248.1 CLEAR
KHSH-TV LIC SKHO BROADCASTING PAR ALVIN TX	1 67 o 5000 III DA			257.8 <24.1, >96.6 161.2 CLEAR

#### Table IIa

# NTSC Channel 52 New Iberia, Louisiana Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

#### prepared for

Channel 52 Zone III Call Auth License City of License St	- Latitude: 3 e name C FCC File No.	0-21- han Zone	44 - ERP I (kW)	Longi HAAT-m HAMSL	tude: 92- Latitude Longitude	-12-53 BR-to -from	Dist. (km)	Req. (km)
	N PROPOSED	37 o II			26-46-45 99-20-22	241.9	801.5	119.9
WNOL-TV LIC QUINCY NEW ORLEANS LA	JONES BROADCAS BLCT-840410KE	38 + III		311	29-58-41 89-56-26			
	OF BATON ROUG BLCT-910813KF		3871 DABT	426 427				
WGMB BATON ROUGE LA	DTV	-45 III	281	426	30-19-35 91-16-36			<24.1, >96.6 SHORT
WBRZ BATON ROUGE LA	DTV	-47 III	3652	515	30-17-49 91-11-40			<24.1, >96.6 CLEAR
	MANAGEMENT CORP BLCT-951010KS		500 DABT					
WNTZ NATCHEZ MS		-49 o III	167	316	31-38-32 91-33-19			<24.1, >96.6 CLEAR
KFDM-TV BEAUMONT TX	DTV	-50 III	4147	293	30-08-24 93-58-44			<24.1, >96.6 CLEAR
WUPL SLIDELL LA	DTV	-51 III	245	213	30-17-09 89-54-18			<9.7, >88.5 CLEAR
KNWS-TV KATY T)	DTV	-52	145	500	29-33-40 95-30-04			
KFXK LONGVIEW TX	DTV	-52 II	347	381	32-15-35 94-57-02			
	STONE, INC. A BLCT-950530KE	54 + III	4376 DABT					
KHIM CP IMAGIST	rs K BMPCT-951026KE	55 + III	5000 BT					
	MUNICATIONS COR S BPCT-960920LV	56 + III	5000 BT					
KHSH-TV LIC SKHO BI	··	67 o III	5000 DA		29-34-06 95-29-57			

#### Table IIb

# NTSC Channel 53 New Iberia, Louisiana Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

#### prepared for

Call Auth Lice City of License	<pre>III - Latitude: nsee name   St FCC File No.</pre>	Chan Zone	ERP I	HAAT-m HAMSL	Latitude Longitude	BR-to	Dist. (km)	(km)	
WNOL-TV LIC QUIN	CY JONES BROADCAS LA BLCT-840410KE	38 +	5000	311	29-58-41 89-56-26	100.5	223.1	119.9	
KMCT-TV WEST MONROE	DTV LA	'38 II	50.0	152	32-30-21 92-08-54				>96.6
WNOL-TV NEW ORLEANS	LA	739 III	371	311	29-58-41 89-56-26	100.5 281.6	223.1 126.5	<24.1, CLEAR	>96.6
WGMB BATON ROUGE	DTV LA	'45 III	281	426	30-19-35 91-16-36				>96.6
WDSU NEW ORLEANS	LA	/46 III	4096	283	29-57-01 89-57-28				>96.6
WNTZ LIC DELT	A MANAGEMENT CORE MS BLCT-951010KS		500 DABT						
WNTZ NATCHEZ	MS	749 o III		316	31-38-32 91-33-19				>96.6
KFDM-TV BEAUMONT	TX	750 III	4147	293	30-08-24 93-58-44				>96.6
WUPL SLIDELL	LA	/51 III	245	213	30-17-09 89-54-18				>96.6
KNWS-TV KATY	VTC XT	752	145	500	29-33-40 95-30-04				>88.5
KWTX-TV WACO	)TTC	753 II	1065	552	31-19-19 97-18-58				
WUPL LIC CORN	IERSTONE, INC. LA BLCT-950530KE		4376 DABT						
KHIM CP IMAG CONROE	GISTS TX BMPCT-951026		5000 BT						
NEW APP KB (	COMMUNICATIONS COMMS BPCT-960920LV		5000 BT						

#### Table IIc

# NTSC Channel 60 New Iberia, Louisiana Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

prepared for

# Iberia Communications, L.L.C.

Channel 60 Zone III - Latitu Call Auth Licensee name City of License St FCC File	Chan No. Zone	ERP (kW)	HAAT-m HAMSL	Latitude Longitude	BR-to -from	Dist. (km)	Req.	
WGMB BATON ROUGE LA		281		30-19-35 91-16-36	92.3	90.26	<24.1,	>96.6
WDSU NEW ORLEANS LA	DTV46 III		283	29-57-01 89-57-28				>96.6
KNWS-TV KATY TX	DTV52	145	500	29-33-40 95-30-04				>96.6
KHIM CP IMAGISTS CONROE TX BMPCT-953				30-13-50 95-07-25				
NEW APP KB COMMUNICATIONS WIGGINS MS BPCT-9609				31-07-09 89-38-49				
KVVV LIC VVI BAYTOWN, INC BAYTOWN TX BLCT-9202	. 57 + 207KE III	5000 DABT	585 589	29-17-56 95-14-11				
KDTX-TV LIC TRINITY BCG OF TO DALLAS TX		5000 DA		32-35-22 96-58-10				
KTBC-TV AUSTIN TX	DTV59 III		384	30-18-36 97-47-33				
ALLOC SUBJECT TO FREEZ TYLER TX	E 60 o			32-21-04 95-18-03				
KZJL CP URBAN BROADCASTII HOUSTON TX BMPCT-95				29-33-25 95-30-04				
NEW APP W B CORPORATION HAMMOND LA BPCT-960				30-25-56 91-11-06				
KHSH-TV LIC SKHO BROADCASTING ALVIN TX		5000 DA		29-34-06 95-29-57				

#### Table IId

# NTSC Channel 61 New Iberia, Louisiana Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

prepared for

# Iberia Communications, L.L.C.

Channel 61 Zone III - Latitude: 3 Call Auth Licensee name City of License St FCC File No.	Chan ERP H Zone (kW)	AAT-m Latitude HAMSL Longitude	BR-to Distfrom (km)	Req. (km)
WDSU DTV	-46 4096	283 29-57-01 89-57-28	101.4 222.1	<24.1, >96.6
	-47 3652 III	515 30-17-49 91-11-40	94.0 98.36 274.5 1.76	
WUPL LIC CORNERSTONE, INC. SLIDELL LA BLCT-950530KE	54 + 4376 III DABT	213 30-17-09 219 89-54-18	91.6 222.3 272.8 126.6	95.70 CLEAR
NEW APP KB COMMUNICATIONS COR WIGGINS MS BPCT-960920LV			70.4 259.8 251.7 228.4	
KVVV LIC VVI BAYTOWN, INC. BAYTOWN TX BLCT-920207KE	57 + 5000 III DABT	585 29-17-56 589 95-14-11		
KZJL CP URBAN BROADCASTING SY HOUSTON TX BMPCT-950725KE				
KZJL LIC URBAN BROADCASTING SY HOUSTON TX BLCT-950614KE				
NEW APP MARRI BROADCASTING, L MOBILE AL BPCT-960725LB	III BT	151 88-05-40	82.8 397.5 264.9 68.52	329 CLEAR
ALLOC SUBJECT TO FREEZE MOBILE AL	61 III	30-41-18 88-02-36	83.8 401.9 265.9 72.90	
NEW APP TV CAPITAL CORP. OF M MOBILE AL BPCT-960920WX				
NEW APP FANT BCGT. DEVELOPMEN MOBILE AL BPCT-960722KQ				
NEW APP W B CORPORATION HAMMOND LA BPCT-960920LW				
ALLOC GRANTED EFF 6-27-86 HAMMOND LA DOC-85-77	62 + III	30-30-06 90-27- <b>4</b> 2	84.3 169.1 265.2 81.38	

#### Table IIe

# NTSC Channel 63 New Iberia, Louisiana Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

#### prepared for

Channel 63 Zone III - Latitude: Call Auth Licensee name City of License St FCC File No.	Chan Zone	ERP HA	AT-m AMSL	Latitude Longitude	BR-to -from	Dist. (km)	Req.	
WNTZ LIC DELTA MANAGEMENT CORP NATCHEZ MS BLCT-951010KS	48 o	500	61	31-38-32	23.7	155.2	119.9	
WCCL DTV NEW ORLEANS LA	48 III		271	29-55-11 90-01-29				>96.6
WNTZ DTV NATCHEZ MS	49 o III	167	316	31-38-32 91-33-19	23.7 204.0	155.2 58.6	<24.1, CLEAR	>96.6
KHIM CP IMAGISTS CONROE TX BMPCT-951026K			570 599					
NEW APP KB COMMUNICATIONS COR WIGGINS MS BPCT-960920LV			609 680					
KDTX-TV LIC TRINITY BCG OF TEXAS, DALLAS TX		5000 DA	438	32-35-22 96-58-10				
KTBC-TV DTV AUSTIN TX	/~-59 III	1550	384	30-18-36 97-47-33				>96.6
ALLOC SUBJECT TO FREEZE TYLER TX	60 o II			32-21-04 95-18-03				
KZJL CP URBAN BROADCASTING SY HOUSTON TX BMPCT-950725F								
NEW APP W B CORPORATION HAMMOND LA BPCT-960920LW				30-25-56 91-11-06				
ALLOC GRANTED EFF 6-27-86 HAMMOND LA DOC-85-77	62 + III			30-30-06 90-27- <b>4</b> 2				
LMRS DPLMRS CHANNEL SHARIN HOUSTON TX	N 63 o	<b>)</b>		29-45-26 95-21-37				
KHSH-TV LIC SKHO BROADCASTING PARALVIN TX		5000 DA		29-34-06 95-29-57				

#### Table IIf

#### NTSC Channel 64 New Iberia, Louisiana Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

prepared for

# Iberia Communications, L.L.C.

Channel 64 Zone III - Latitude: Call Auth Licensee name City of License St FCC File No.	Chan Zone	ERP (kW)	HAAT-m HAMSL	Latitude Longitude	BR-to	(km)	(km)	
		167		31-38-32 91-33-19	23.7	155.2	<24.1,	>96.6
WCCL LIC GEORGE S. FLINN, JR. NEW ORLEANS LA BLCT-940609K		5000 DABT		29-55-11 90-01-29				
WCCL CP GEORGE S. FLINN, JR. NEW ORLEANS LA BPCT-941228K								
KFDM-TV DT BEAUMONT TX	V50 III	4147	293	30-08-24 93-58-44				>96.6
PRM PROPOSED RULE MAKING NATCHITOCHES LA DOC-84-709	50 o III			31-45-42 93-05-12				
PRM PROPOSED RULE MAKING COLUMBIA LA DOC-84-709	50 + II			32-06-18 92-04-36				
NEW APP KB COMMUNICATIONS CO WIGGINS MS BPCT-960920L								
KVVV LIC VVI BAYTOWN, INC. BAYTOWN TX BLCT-920207K		5000 DABT						
KTBC-TV DT AUSTIN TX	V59 III		384	30-18-36 97-47-33				>96.6
ALLOC SUBJECT TO FREEZE TYLER TX	60 o			32-21-04 95-18-03				
KZJL CP URBAN BROADCASTING S HOUSTON TX BMPCT-950725		4680 DABT						
NEW APP W B CORPORATION HAMMOND LA BPCT-9609201		5000 BT						
LMRS DPLMRS CHANNEL SHARI HOUSTON TX	N 63 c			29-45-26 95-21-37				
ALLOC SUBJECT TO TV FREEZE MINEOLA TX	64 + II			32-39-42 95-29-18				

#### Table IIg

#### NTSC Channel 65 New Iberia, Louisiana Comments on the Draft DTV Table of Allotments Sixth Notice of Proposed Rulemaking MM Docket 87-268

prepared for

# Iberia Communications, L.L.C.

Call Auth Lic City of License	<pre>III - Latitude: ensee name    St FCC File No.</pre>	Chan Zone	ERP (kW)	HAAT-m HAMSL	Latitude Longitude	BR-to	Dist. (km)	Req.	
KFDM-TV BEAUMONT		50		293	30-08-24 93-58-44	262.1	171.5	<24.1,	>96.6
	POSED RULE MAKING LA DOC-84-709								
PRM PRO	POSED RULE MAKING LA DOC-84-709				32-06-18 92-04-36				
WUPL SLIDELL	DTV-	51 III		213	30-17-09 89-54-18				>96.6
KVVV LIC VVI BAYTOWN	BAYTOWN, INC. TX BLCT-920207KE								
KDTX-TV LIC TRI DALLAS	NITY BCG OF TEXAS,		5000 DA		32-35-22 96-58-10				
ALLOC SUB TYLER	JECT TO FREEZE	60 o II			32-21-04 95-18-03				
KZJL CP URE HOUSTON	AN BROADCASTING SY TX BMPCT-950725K				29-33-25 95-30-04				
NEW APP WE	CORPORATION LA BPCT-960920LW				30-25-56 91-11-06				
LMRS DPI HOUSTON	MRS CHANNEL SHARIN	63 o III			29-45-26 95-21-37				
NEW APP CAM AUSTIN	MERON BROADCASTING TX BPEX-930521KG	65 III	3.00		30-16-54 97-44-30				
KHSH-TV LIC SKE ALVIN	O BROADCASTING PAR	67 o III	5000 DA	563 563	29-34-06 95-29-57				
LMRS DPI HOUSTON	MRS CHANNEL SHARIN	69 o III			29-45-26 95-21-37				